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*Attorneys for Defendants*  
*Royce Plowman and Madison Smith*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

EDWARD KELLER, JR., individually,  
Plaintiff,

vs.

ROYCE PLOWMAN, individually, MADISON  
SMITH, individually; DOES I through X,  
inclusive; ROE CORPORATIONS XI through  
XX, inclusive,  
Defendants.

Case No. 2:20-cv-00284-JCM-VCF

**STIPULATION AND ORDER TO  
DISMISS CASE WITH PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED, between Plaintiff Edward Keller, Jr., individually through his attorneys of record, Justin W. Wilson, Esq., of J HICKS & BRASIER, and Defendants Royce Plowman and Madison Smith through their attorneys of record Thomas E. McGrath, Esq. and Christopher A. Lund, Esq. of the law firm of TYSON & MENDES, LLP, that the Complaint filed by Plaintiff, and each and every cause of action alleged therein, be dismissed WITH PREJUDICE each side to bear its own attorney fees and costs.

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IT IS HEREBY FURTHER STIPULATED AND AGREED that the Calendar Call set for March 9, 2022, and the Trial date of March 14, 2022 be vacated.

DATED this 23<sup>rd</sup> day of November 2021.

DATED this 23<sup>rd</sup> day of November 2021.

HICKS & BRASIER, PLLC

TYSON & MENDES LLP

/s/ Justin Wilson

JUSTIN W. WILSON, ESQ.  
Nevada Bar No. 14646  
HICKS & BRASIER, PLLC  
2630 South Jones Boulevard  
Las Vegas, Nevada 89146  
Attorneys for Plaintiff  
*Edward Keller, Jr.*

/s/ Christopher A. Lund

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Las Vegas, Nevada 89169  
Attorneys for Defendants  
*Royce Plowman and Madison Smith*

**ORDER**

Based upon the Stipulation of the parties, the Court having reviewed all pleadings and papers on file herein, and good cause appearing.

IT IS HEREBY ORDERED that this case in its entirety, is dismissed WITH PREJUDICE each party to bear its own attorney's fees and costs herein.

IT IS HEREBY FURTHER ORDERED the Calendar call set for March 9, 2022, and the Trial date of March 14, 2022 are hereby VACATED.

DATED November 30, 2021.

  
UNITED STATES DISTRICT JUDGE

Submitted by:  
TYSON & MENDES LLP

/s/ Christopher A. Lund

THOMAS E. MCGRATH  
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CHRISTOPHER A. LUND  
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Attorneys for Defendants  
*Royce Plowman and Madison Smith*

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**From:** Justin Wilson <[jwilson@lvattorneys.com](mailto:jwilson@lvattorneys.com)>  
**Sent:** Tuesday, November 23, 2021 10:20 AM  
**To:** Chris Lund <[CLund@TysonMendes.com](mailto:CLund@TysonMendes.com)>; Alisha Ricketts <[alisha@lvattorneys.com](mailto:alisha@lvattorneys.com)>; Tom McGrath <[TMcGrath@TysonMendes.com](mailto:TMcGrath@TysonMendes.com)>; Christina Espinosa <[CEspinosa@TysonMendes.com](mailto:CEspinosa@TysonMendes.com)>  
**Subject:** RE: Keller v. Plowman proposed release agreement

Approved.

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**From:** Chris Lund <[CLund@TysonMendes.com](mailto:CLund@TysonMendes.com)>  
**Sent:** Tuesday, November 23, 2021 9:17 AM  
**To:** Alisha Ricketts <[alisha@lvattorneys.com](mailto:alisha@lvattorneys.com)>; Tom McGrath <[TMcGrath@TysonMendes.com](mailto:TMcGrath@TysonMendes.com)>; Christina Espinosa <[CEspinosa@TysonMendes.com](mailto:CEspinosa@TysonMendes.com)>  
**Cc:** Justin Wilson <[jwilson@lvattorneys.com](mailto:jwilson@lvattorneys.com)>  
**Subject:** RE: Keller v. Plowman proposed release agreement

Good morning,

I have attached a proposed SAO to Dismiss the case. Let me know if you would like any changes. If

not, please let me know if I may add your e-signature.

Thank you.



Christopher A. Lund

**Senior Counsel**

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**From:** Alisha Ricketts <[alisha@lvattorneys.com](mailto:alisha@lvattorneys.com)>

**Sent:** Tuesday, November 9, 2021 5:53 PM

**To:** Chris Lund <[CLund@TysonMendes.com](mailto:CLund@TysonMendes.com)>; Tom McGrath <[TMcGrath@TysonMendes.com](mailto:TMcGrath@TysonMendes.com)>; Christina Espinosa <[CEspinosa@TysonMendes.com](mailto:CEspinosa@TysonMendes.com)>

**Cc:** Justin Wilson <[jwilson@lvattorneys.com](mailto:jwilson@lvattorneys.com)>

**Subject:** RE: Keller v. Plowman proposed release agreement

Good evening Mr. Lund,

Regarding the above matter, our office is in receipt of the settlement check. Please find the attached executed settlement release. I will mail the original to your office. Will you also forward the Stip and Order for Dismissal so Mr. Wilson can review for use of his e-signature?

**Thank you,**

**Alisha Ricketts**

**Paralegal**

 **Hicks & Brasier**

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